



# California Fair Political Practices Commission

September 1, 1987

Mr. Stoakley Swanson  
Chairman, Sacramento County  
Republican Central Committee  
P.O. Box 1523  
Fair Oaks, CA 95628

Re: Your Request for Advice  
Our File No. I-87-207

Dear Mr. Swanson:

This is to confirm the telephone advice I provided to you on July 31, 1987, concerning your duty to file campaign disclosure statements as a member of the Sacramento County Republican Central Committee. This advice is provided pursuant to the campaign disclosure provisions of the Political Reform Act (the "Act").<sup>1/</sup>

## FACTS

You have not received any contributions or made any expenditures on your behalf during 1987. However, you have used personal funds to make contributions to the Sacramento Republican Party and to various county central committees. You receive no salary as chairman of the central committee.

## QUESTION

Are you required to file a statement for the semi-annual period ending June 30, 1987?

## CONCLUSION

You are required to file a statement for the semi-annual period ending June 30, 1987.

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<sup>1/</sup>Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Administrative Code Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Administrative Code.

Because this letter is confirming telephone advice, we consider it to be a request for informal assistance pursuant to Regulation 18329(c). Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 84113; Regulation 18329(c)(3).)

ANALYSIS

Membership on a county central committee of a qualified political party is an "elective office." (Section 82023.) As chairman of the Sacramento County Republican Central Committee, you are an "elected officer." (Section 82020)

When an elected officer makes campaign contributions to other elected officers, candidates or committees from personal funds, those contributions must be reported in the same manner as contributions made from the officer's campaign funds. (Section 82015.) Section 84200(a) provides that elected officers must file semi-annual statements whether or not they have had any campaign activity during the six-month period covered by the statement.

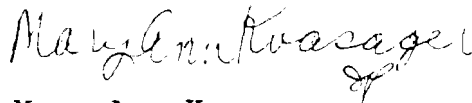
However, Section 84200(a)(2) provides an exception for elected officers whose salary is less than \$100 per month. Section 84200(a)(2) provides that such officers are not required to file semi-annual statements unless they have made or received any contributions or made any expenditures. Since you made campaign contributions from your personal funds, you are required to file a semi-annual campaign statement covering the period January 1 through June 30, 1987.

The membership dues you paid to non-profit organizations are not "contributions" as long as no portion of the membership dues is used for political purposes. (Sections 82015; Regulation 18215.) Membership dues are not required to be disclosed on a campaign statement.

Please contact me if you have additional questions concerning this matter.

Sincerely,

Diane M. Griffiths  
General Counsel



By: Mary Ann Kvasager  
Political Reform Consultant

DMG:MAK:kmt  
Enclosures